

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
OCT 9 9 37 AM '98
OFFICE OF THE SECRETARY
Docket No. MC98-1

Mailing Online Service)

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: LEE GARVEY
(OCA/USPS-T1-43-44)
(October 9, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

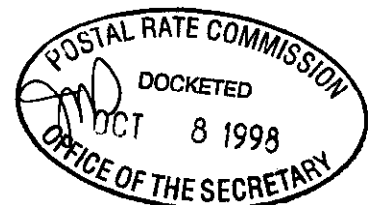
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T1-43. Please refer to Tr. 4/843. Here you refer to a "new version of the [Mailing Online] system due to be implemented for the market test"

- a. Has this new version been implemented? If not, what is the expected date of implementation?
- b. Does this new system record data in sufficient detail to permit creation of tabulations of AP volumes by job type by page count by presort discount qualification? If so, please provide such tabulations for each available AP.
- c. Can data from the new system be merged with data from some other system (e.g., mailing statements or sortation software reports) so as to generate the tabulations requested in part b. of this interrogatory? If so, please provide such tabulations for each available AP.
- d. Can the tabulations requested in parts b. and c. of this interrogatory be generated for periods other than APs? If so, please provide such tabulations for each available period.


OCA/USPS-T1-44. Please refer to Tr. 4/845. Here you state that "it would be possible to modify the system so as to store and forward the reports [generated by the sortation software in Mailing Online]"

- a. Has such a modification been performed? If not, what is the expected date of modification?
- b. What is the name of the sortation software utilized in Mailing Online? Please provide a copy of any instruction manuals, documentation, readme files, or online help files that accompany the sortation software.

- c. Do commercial mailers or presort bureaus use the same sortation software? Do such other users maintain electronic records of the manifests, 3600s, and 3602s generated by the sortation software? If so, what prevents the Postal Service from doing the same?
- d. Can the sortation software used in Mailing Online generate a report that shows the volumes for each manifest, 3600, or 3602 that would qualify for each presort discount? (See PRC Op. MC98-1, October 7, 1998, at 45: "If the mailing statements provide the level of sort achieved on each batch . . . , then the provision of these statements will be sufficient.") If so, please provide all such existing reports and all future reports on an ongoing basis (electronic and hard copy). If not, please "find an alternative means of providing the depth of sort data for each batch." *Id.*
- e. Can any of the manifests, 3600s, or 3602s generated by the sortation software be associated with a particular page count/job type category. For example, do the reports or mailing statements generated by the sortation software contain an identification code that can be associated with an identification code in the job type/page count reports generated by the system software? If so, please provide the tabulations requested in OCA/USPS-T1-43.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
October 9, 1998